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*Special Counsel to Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC and Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (BRL)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the  
Liquidation of Bernard L. Madoff Investment  
Securities LLC,

Plaintiff,

v.

MILES Q. FITERMAN REVOCABLE TRUST,  
*et al.*,

Defendants.

Adv. Pro. No. 10-04337 (BRL)

**STIPULATION FOR EXTENSION OF TIME TO RESPOND**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which Defendants the Miles Q. Fiterman Revocable Trust; the Miles Q. Fiterman Non-Exempt Marital Trust; Towers Management Company LLC; the Fiterman GST Exempt Marital Trust; the Miles Fiterman Family Trust; Shirley Fiterman, individually, and in her capacity as Trustee for the Miles Q. Fiterman Revocable Trust and the Miles Q. Fiterman Non-Exempt Marital Trust; Steven Fiterman, individually, and in his capacity as Trustee for the Miles Q. Fiterman Revocable Trust and the Miles Q. Fiterman Non-Exempt Marital Trust; Valerie Herschman, individually, and in her capacity as Trustee for the Miles Q. Fiterman Revocable Trust and the Miles Q. Fiterman Non-Exempt Marital Trust; Karen Wasserman; Lynn Guez; Stephanie Rosenthal; Miles Q. Fiterman II; and Matthew Fiterman (collectively, the “Defendants”) may move, answer or otherwise respond to the Amended Complaint is extended up to and including December 14, 2011. The pre-trial conference will be adjourned from November 30, 2011 to January 25, 2012 at 10:00 a.m.

The purpose of this stipulated extension is to provide additional time for Defendants to answer, move against, or otherwise respond to the Amended Complaint. This is the ninth such extension. Nothing in this stipulation is a waiver of the Defendants’ right to request from the Court a further extension of time to answer, move or otherwise respond and/or the Trustee’s right to object to any such request.

Except as expressly set forth herein, the parties to this stipulation reserve all rights and defenses they may have, and entry into this stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this stipulation shall be deemed an original. This Stipulation is entered into pursuant to the Order Regarding Stipulations Extending Time to Respond and Adjourning Pre-Trial Conferences (Dkt. No. 4158) in the above-captioned case (Adv. Pro. No. 08-01789 (BRL)).

Dated: New York, New York  
October 6, 2011

By: /s/ Howard L. Simon  
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*Special Counsel for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation of Bernard L.  
Madoff Investment Securities LLC and Bernard L. Madoff*

Dated: Minneapolis, MN  
October 6, 2011

By: /s/ Thomas B. Hatch  
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